

## Samuel Goldman & Associates

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December 23, 2015

**Via ECF**

U.S. District Court Judge Vernon S. Broderick  
U.S. District Court for the Southern District of New York  
40 Foley Square, Room 518  
New York, NY 10007

**Re: American Lecithin Co. et al. v. Rebmann, Case No. 12-cv-00929-(VSB)**

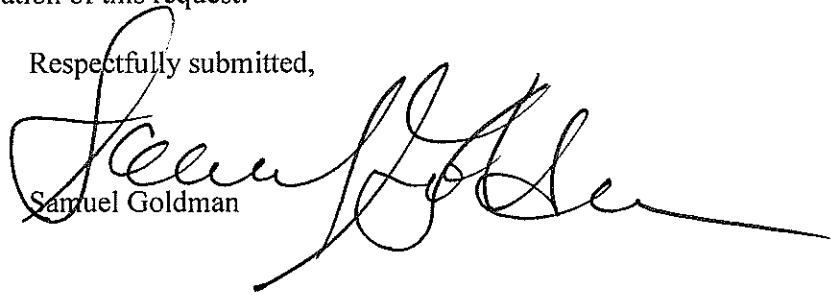
Your Honor:

We represented Defendant C. Matthias Rebmann in the above-referenced matter. We are writing on behalf of both parties in reference your December 7, 2015 Order instructing us to submit a joint letter on the status of discovery on Plaintiffs' original claims (Dkt. 228).

We have conferred with Counsel for Plaintiffs and we believe that additional discovery is necessary. We have agreed that both sides will serve any document production requests and interrogatories by Monday, January 11, 2015. Then, both sides will have until Thursday, February 11, 2015 to respond to any document requests and interrogatories. The February 11th deadline to respond to any document requests and interrogatories may be subject to extension, not to exceed thirty days, by agreement of both parties. Assuming the deadlines are met, both sides will make any notices for deposition by Friday, March 11, 2015.

We thank the Court for its consideration of this request.

Respectfully submitted,



Samuel Goldman

Without more specific information regarding the nature of the proposed additional discovery, I cannot assess whether this schedule is reasonable. The parties should identify with specificity the discovery they believe is outstanding and state why this discovery warrants the timeline proposed in this letter. To the extent the additional discovery includes depositions the parties should identify the deponent and the expected relevance of the testimony. The parties should submit a revised proposal by January 5, 2016.

**SO ORDERED:**



HON. VERNON S. BRODERICK 12/28/2015  
UNITED STATES DISTRICT JUDGE